

# EXHIBIT 1

THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

STEPHEN McCOLLUM, STEPHANIE \*  
KINGREY, and SANDRA \*  
McCOLLUM, individually and as \*  
heirs at law to the Estate of \*  
LARRY GENE McCOLLUM, \*

PLAINTIFFS \*

vs. \*

CIVIL ACTION NO.  
3:12-CV-02037

BRAD LIVINGSTON, JEFF PRINGLE, \*  
RICHARD CLARK, KAREN TATE, \*  
SANDREA SANDERS, ROBERT EASON, \*  
the UNIVERSITY OF TEXAS \*  
BRANCH and the TEXAS \*  
DEPARTMENT OF CRIMINAL JUSTICE \*

DEFENDANTS \*

ORAL VIDEOTAPED 30(B)6 DEPOSITION OF JEFF PRINGLE

August 12th, 2013

ORAL VIDEOTAPED 30(B)6 DEPOSITION OF JEFF

PRINGLE, produced as a witness at the instance of the  
Plaintiffs and duly sworn, was taken in the above-styled  
and numbered cause on the 12th day of August, 2013, from  
10:33 a.m. to 1:33 p.m., before Curtis High, Certified  
Shorthand Reporter in and for the State of Texas,  
reported by computerized stenotype machine at the  
Hutchins Unit of the Texas Department of Criminal  
Justice, 1500 E. Langdon Road, Dallas, Texas 75241,  
pursuant to the Federal Rules of Civil Procedure and the  
provisions stated on the record or attached hereto.

Stephen McCollum, et al  
Brad Livingston, Jeff Pringle, et al

Jeff Pringle  
August 12, 2013

1 MR. GARCIA: Objection.

2 MR. EDWARDS: We talked about that in the  
3 last deposition.

4 MR. GARCIA: Exactly. Asked and answered.

5 Q (By Mr. Edwards) Okay. As you testify here  
6 today you don't think it's important for you to know  
7 what the warning signs of heat stroke are?

8 A I do not recall what they are.

9 Q I know you don't recall what they are. My  
10 question is don't you think it's important that you do  
11 know that?

12 A No, I do not.

13 Q Don't you think it's really important that your  
14 correctional officers know that?

15 A I do not know what is important that they need  
16 to know.

17 Q Aren't you their supervisor?

18 A I am the highest ranking security supervisor on  
19 the Hutchins Unit.

20 Q Do you take no responsibility for what your  
21 officers ought to know relating to warning signs of heat  
22 stroke?

23 A No, I do not.

24 Q Okay. Just so I am clear because I think that  
25 question may be -- I want to make perfectly clear. Sir,

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1 is it your testimony that you take absolutely no  
2 responsibility for your officers knowing what the  
3 warning signs are for heat stroke?

4 A That would be true.

5 Q Okay. Do you find that to be a dangerous  
6 viewpoint for the senior supervisor of the Hutchins Unit  
7 to have?

8 A No, I do not.

9 Q Okay. Do you know if Director Eason knows that  
10 that's your opinion?

11 MR. GARCIA: Objection, speculation.

12 THE WITNESS: I do not know.

13 Q (By Mr. Edwards) Okay. You haven't discussed  
14 that opinion with him?

15 A No, I have not.

16 Q Okay. Do you know if Mr. Thaler, Mr. Stephens  
17 or Mr. Livingston know that that's your opinion?

18 MR. GARCIA: Objection, speculation.

19 MR. EDWARDS: It's not speculation.

20 Q (By Mr. Edwards) Do you know, sir?

21 A I do not.

22 Q Okay. And again, you haven't had any  
23 conversations with those gentlemen about what we are  
24 talking about?

25 A Correct.

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1 Q Okay. Prior to Mr. McCollum's death had the  
2 Texas Department of Criminal Justice ever received any  
3 complaints about the heat in the Hutchins Unit?

4 A I have been made aware that they have.

5 Q Okay. Those complaints have come from  
6 employees as well as inmates, correct?

7 A I do not know the exact locations.

8 Q Do you know if employees have made complaints  
9 about the heat in the Hutchins Unit during the summer?

10 A Yes, they have.

11 Q Okay. Do you know if inmates have made  
12 complaints about the heat in the Hutchins Unit during  
13 the summer?

14 A Yes, they have.

15 Q Both of those -- they occurred before  
16 Mr. McCollum's death, correct?

17 A I do not recall.

18 Q On behalf of TDCJ you just have no idea before  
19 Mr. McCollum's death there were complaints about the  
20 heat in the Hutchins Unit from inmates or employees. Is  
21 that your testimony?

22 A Correct.

23 Q Okay. How would I find that out then, sir, if  
24 you are not capable of testifying -- helping me?

25 A We have -- offenders have a grievance

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1 Ms. Gilford or Ms. Brady, to make sure that they put a  
2 request in for him to be transferred to a facility that  
3 can provide that care.

4 Q So just to be crystal clear. If UTMB made a  
5 decision look, this person's health requires him to be  
6 in an air conditioned unit for let's say two months of  
7 the year, you guys would do what you can to make that  
8 happen, fair?

9 A We would make sure that the request only by  
10 asking medical if they submitted the request in. UTMB  
11 has to make the request.

12 Q If UTMB made that request then steps would be  
13 taken to get the individual to an air conditioned unit,  
14 correct?

15 A That would be the process.

16 MR. EDWARDS: Thank you very much. I will  
17 just hand that over to the court reporter, please.  
18 Thank you.

19 MS. COOGAN: That's it. Just for the  
20 record I guess Exhibit 37 was also the number for  
21 Eason's depo notice.

22 MR. GARCIA: 36A.

23 MR. EDWARDS: That's fine. 36A. Let's  
24 call it 36A. Just for the record this will be  
25 renumbered 36A for everyone.

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1 STATE OF TEXAS

2 COUNTY OF DALLAS

3 REPORTER'S CERTIFICATE

4 ORAL VIDEOTAPED 30(B)6 DEPOSITION OF JEFF PRINGLE

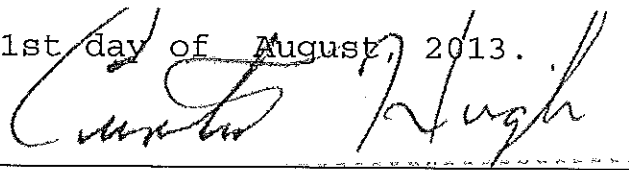
5 August 12th, 2013

6  
7 I, the undersigned Certified Shorthand Reporter  
8 in and for the State of Texas, certify that the facts  
9 stated in the foregoing pages are true and correct.

10 Signature of the witness was not requested by  
11 the witness or any party before the completion of the  
12 deposition.

13 I further certify that I am neither attorney or  
14 counsel for, related to, nor employed by any parties to  
15 the action in which this testimony is taken and,  
16 further, that I am not a relative or employee of any  
17 counsel employed by the parties hereto or financially  
18 interested in the action.

19 SUBSCRIBED AND SWORN TO under my hand and seal  
20 of office on this the 21st day of August, 2013.

21 

22 CURTIS HIGH, CSR NO. 484  
23 Expiration Date: 12/31/14  
24 Wright Watson & Associates  
25 Firm Registration No. 225  
3307 Northland Drive  
Suite 185  
Austin, Texas 78731

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